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**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	Case No: 2:11-cr-00036 WBS
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS
v.)	CONFERENCE
)	
Larry ABEYTA,)	
Michael CORSBIE, Jr.)	
)	
Defendants.)	
)	

The defendants, Larry Abeyta and Michael Corsbie, Jr. through their undersigned counsel, and the United States, through its undersigned counsel, hereby agree and request the Status Conference currently set for Monday, April 25, 2011 at 8:30 am be vacated and continued until Monday, May 9, 2011 at 8:30 am.

1 A continuance is necessary to provide counsel with additional time for case
2 preparation and for ongoing plea and sentencing negotiations.

3 The parties also stipulate that time should be excluded under the Speedy
4 Trial Act due to the needs of counsel for continued case preparation and ongoing
5 plea and sentencing negotiations. Local Code T4 & 18 U.S.C § 3161 (h)(7)(B)(iv).
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8 I, William E. Bonham, the filing party, have received authorization from
9 Assistant Federal Defender Courtney Fein and AUSA William Wong to sign and
10 submit this stipulation and proposed order on their behalf.
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12 Accordingly, the defense and the United States agree and stipulate that the
13 Status Conference for defendants Larry Abeyta and Michael Corsbie, Jr. should be
14 continued until Monday, May 9, 2011 at 8:30 am. The parties stipulate that the
15 ends of justice served by granting this continuance outweigh the best interests of
16 the public and defendant in a Speedy Trial. 18 U.S.C. § 3161(h)(7)(A).
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19 Dated: April 21, 2011

20 BENJAMIN B. WAGNER
21 United States Attorney

22 By: /s/ WILLIAM E. BONHAM for
23 WILLIAM WONG
24 Assistant U.S. Attorney

25 Dated: April 21, 2011

26 By: /s/ WILLIAM E. BONHAM for
27 WILLIAM E. BONHAM
28 Counsel for Defendant
Michael CORSBIE

1 Dated: April 21, 2011

DANIEL J. BRODERICK
Federal Defender

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4 WILLIAM E. BONHAM for
5 COURTNEY FEIN
6 Assistant Federal Defender
7 Attorney for Defendant
8 Larry ABEYTA
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24 **ORDER**
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1 IT IS SO ORDERED THAT THE Status Conference for defendants, Larry
2 Abeyta and Michael Corsbie, Jr. currently set for Monday, April 25, 2011 at 8:30
3 am should be vacated and continued to Monday, May 9, 2011 at 8:30 am.
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5 I find that the continuance is necessary due to the needs of counsel for
6 continued case preparation and plea/sentencing negotiations. Accordingly, time is
7 excluded under the Speedy Trial Act, due to needs of counsel for additional case
8 preparation and ongoing plea/ sentencing negotiations, from April 25, 2011 up to
9 and including May 9, 2011 pursuant to Local Code T4 and 18 U.S.C. §
10 3161(h)(7)(B)(iv). I find that the ends of justice served by granting this
11 continuance outweigh the best interest of the public and defendant in a speedy trial.
12 18 U.S.C. § 3161(h) (7)(A).
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16 Dated: April 22, 2011
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19 WILLIAM B. SHUBB
20 UNITED STATES DISTRICT JUDGE
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